

**EMOTIONAL STRESS SUPPORT AFFIDAVIT  
OF PLAINTIFF TAMIE RICHARDSON**

As so ordered by this court, this affidavit is being submitted in support of my claim for consideration of damages from emotional stress brought about by the unlawful foreclosure attempt of First Horizon Home Loans starting in 2008.

**STATEMENT**

- (1) I, Tamie Richardson, have been employed for the past 26 years at the office of Dr Christopher J Matthews, DMD.
- (2) For 25 of those years, my now ex-husband was a self-employed building contractor.
- (3) We raised two (2) children who are now both attending college.
- (4) During 2008-2009 I was also a certified health care provider for my 95 year old grandfather who lived with me.
- (5) In 2007, my ex-husband and I were assessed with an IRS tax levy of \$4,500.
- (6) Immediately upon receiving notice of the tax levy, I wrote to them and set up a satisfactory payment schedule with a final payment due May, 2011.
- (7) During the year 2008 my ex-husband received income totally only \$3,000 from his general contracting business.
- (8) My personal income for the year of 2008 was \$23,000.
- (9) Knowing that my salary alone would not be sufficient to cover all of our monthly expenses, I immediately took a pro-active stance to protect my excellent credit rating.
- (10) My original car payment to Southern Oregon Federal Credit Union was \$504 per month. I personally met with them and worked out a repayment schedule to reduce my payments to \$304 a month. This was a direct result of our then, excellent credit and to date I have never missed a payment.

(11) It was in February, 2009 that I first approached First Horizon Home Loans asking for a loan modification. This was done thru a written communication which I sent in with my February payment, which was submitted on time.

(12) By March 10, 2009 I had received no reply from First Horizon Home Loans so I placed a phone call to verify if my letter and loan modification request had been received.

(13) The employee that I spoke with at First Horizon Home Loans on March 10, 2009 confirmed that my account was current, advised there was nothing on file requesting a loan modification and made the suggestion that I apply to the newly created government program. She gave me an internet of [www.HopeNow.com](http://www.HopeNow.com) which I visited that day and submitted my request. (EXHIBIT 6)

(14) I sent a copy of my online application to First Horizon Home Loans when I submitted my March, 2009 payment and also followed up with a phone call.

(15) Shortly thereafter I received a simple letter stating that I did not qualify for a loan modification with no reason given.

(16) My ex-husband, who was already distressed from pressures of the failing economy, the thought of losing our home, how to pay for our children's college expenses and how to handle the management and care of my grandfather, told me he couldn't handle the stress any longer and actually suffered an emotional breakdown.

(17) This problem continued to compound to the point of his moving out and leaving me on my own to do what I could to survive.

(18) A divorce followed a few short months later.

(19) It now became evident that First Horizon had no intentions of helping me in any way so at that point I finally discussed the option of moving with my grandfather and assured him that I would take care of him regardless of the circumstances.

(20) I continued my vigil to try to work out a loan modification with First Horizon thru numerous phone calls, all to no avail.

(21) On May 13, 2009 I finally received a letter from First Horizon stating that a 'trained specialist' had reviewed my loan and financial history and that a low cost refinance was available.

(22) On May 19, 2009 I called and had a very extensive conversation with employee Karen. She confirmed that documents would be sent out to me for review.

(23) On May 29, 2009 I placed a call to First Horizon advising documents had not been received.

(24) On June 3, 2009 I placed a call to First Horizon advising documents had not been received.

(25) On June 17, 2009 I placed a call to First Horizon advising documents had not been received.

(26) On July 1, 2009 I placed a call to First Horizon advising documents had not been received.

(27) After depleting what savings I had in my attempt to keep my loan payment current and retain my excellent credit rating, while awaiting my loan modification documents, I was unable to submit my July, 2009 payment.

(28) On July 8, 2009 I wrote yet another letter to First Horizon outlining that I was unable to submit the July, 2009 payment but that I was scheduled for a loan modification and was awaiting documents in the mail.

(29) My grandfather became quite worried that our life was soon going to be uprooted with no idea of what would happen to him so he began checking my mail daily with great anticipation of receiving the loan modification documents. None ever came.

(30) I still believed that First Horizon would process the loan modification and that everything would be fine and reassured my grandfather of this daily.

(31) I, in the meantime, began to fall into a deep depression with all the pressures being placed on me.

(32) Would I have to put him in a state run facility, give away my dog and cat, move in with a family member, head to Arizona to live with my parents.

(33) My only family in Oregon is my two grown children who are both 'starving students' trying to obtain their college educations so I knew living with one of them wasn't an option, and besides, that would mean giving up my only means of support over the past 26 years since neither of my children live in Grants Pass, Oregon.

(34) Feeling I had no other option, I put the house up for sale.

(35) I did not receive any correspondence or any phone calls from First Horizon by November, 2009.

(36) In November, 2009 I received a call from my real estate broker Chris Barnette to advise that my house was on a Trustee Sale list to be auctioned off in March, 2010.

(37) I immediately called First Horizon but was unable to get anyone to answer any questions that I posed.

(38) I called my mother in Arizona and asked if she knew what rights I might have as a home owner to try to keep my house.

(39) She suggested a file a Qualified Written Request to find out exactly what was owed.

(40) First Horizon failed to respond so I followed up with a series of letters and requests, all of which fell on deaf ears.

(41) Finally in March, 2010 I received a letter from a company called MetLife saying I owed them money for an alleged debt.

(42) I called the MetLife number and advised them I didn't have any dealings with them. It was at this point that I discovered that my loan had been transferred to MetLife for collection.

(43) I repeatedly asked for validation and verification of the debt but have never received anything from them to indicate that they are the rightful owners of the alleged debt.

(44) Sadly, my grandfather passed away shortly thereafter but his last words to me were "Continue the good fight. You have rights and don't let anyone take that away from you."

(45) I have spent countless hours weekly over the past two years learning what my rights are and the correct way to enforce those rights.

(46) I have been on anti anxiety medication since the day I got the call that my house was to be auctioned off.

(47) After three unsuccessful attempts at a loan modification with First Horizon and hundreds of hours of research, I teamed up with my mom to move forward with a strategy to stop the illegal foreclosure by First Horizon.

(48) With this fight to protect my home comes yet more stress of getting documents filed in a timely manner, following proper rules and regulations, and fighting against a trained attorney who knows how to manipulate the system to his advantage.

(49) The frustration of all of the last two years has taken it's toll on me, as it would on any normal person.

(50) If it were not for the assistance and support of my mom and the watchful eye of my deceased grandfather, I would have given up this battle long ago as many other bullied homeowners have done before me.

(51) Instead, I will fight for my rights. All I have worked for throughout my adult life is in this home. It's the house my children can come home to, the house my grandfather died in, and as of February, 2011, is now the home that I share with my brother who is a disabled Navy veteran.

(52) Since February, 2009 I have spent over \$700 just in filing fees and postage.

(53) I have spent over 600 hours in research, study and document preparation.

(54) I have had to take 10 days off of work for court dates, phone conferences, etc.

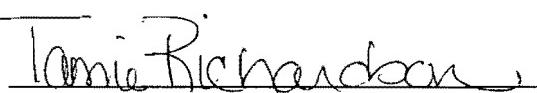
(55) I have had to drive over 20 times to the Federal courthouse in Medford.

(56) I have spent \$75 to subpoena Wanda Collier

(57) In short, this case has totally consumed my life and what little money I had.

(58) This Plaintiff feels that this courts awarding of damages for pain and suffering due to extreme mental anguish is warranted and justified.

Dated: April 29, 2011

  
Tamie Richardson